

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

-----X  
In re:

KAISER GROUP INTERNATIONAL,  
INC., et al.,

Debtors.

Chapter 11

Case No. 00-2263 (MFW)  
Adv. P. No. 01-928 (MFW)

(Jointly Administered)

-----X  
KAISER GROUP INTERNATIONAL,  
INC., et al.,

Plaintiffs,

- against -

ARCELORMITTAL STEEL OSTRAVA,  
a.s. and INTERNATIONAL FINANCE  
CORPORATION,

Defendants.

C.A. No. 07-124 (JJF)

-----X  
KAISER GROUP INTERNATIONAL,  
INC., et al.,

Plaintiffs,

- against -

ARCELORMITTAL STEEL OSTRAVA,  
a.s. and INTERNATIONAL FINANCE  
CORPORATION,

Defendants.

C.A. No. 07-125 (JJF)

-----X  
**CROSS-MOTION OF ARCELORMITTAL STEEL OSTRAVA, A.S.  
(FORMERLY NOVA HUT, A.S.) FOR DAMAGES AND COSTS  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 8020**

Defendant ArcelorMittal Steel Ostrava, a.s. (formerly Nova Hut, a.s.) ("Nova Hut"), by  
and through its undersigned counsel, hereby moves (the "Motion") pursuant to Rule 8020 of the

Federal Rules of Bankruptcy Procedure and 28 U.S.C. § 1927, for damages and costs on the grounds that the Debtors' Motion for Leave to Supplement the Record or, Alternatively, to Remand the Case to the Bankruptcy Court for Reconsideration Based on Newly Discovered Evidence Pursuant to Rule 60(b)(2) is frivolous.

In support of this Motion, Nova Hut relies upon the Memorandum of Law in Opposition to Debtors' Motion to Supplement the Record or, Alternatively, to Remand the Case to the Bankruptcy Court for Reconsideration Based on Newly Discovered Evidence Pursuant to Rule 60(b)(2), and in Support of Cross-Motion for Damages and Costs filed contemporaneously herewith.

Dated: March 17, 2008

GREENBERG TRAURIG, LLP



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— and —

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*Attorneys for ArcelorMittal Steel Ostrava, a.s.  
(formerly Nova Hut, a.s.)*

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## CERTIFICATE OF SERVICE

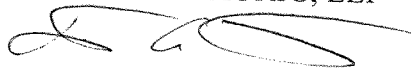
I, Dennis A. Meloro, being duly sworn according to law, deposes and says that I am employed by Greenberg Traurig, LLP, which is counsel for Defendant Nova Hut, a.s. (n/k/a ArcelorMittal Steel Ostrava, a.s.), and that on March 17, 2008, caused to be served copies of the following to be served upon the parties listed below in the manner indicated:

- *Cross-Motion for Damages and Costs Pursuant to Federal Rule of Bankruptcy Procedure 8020*
- *Memorandum Of Law In Opposition To Debtors' Motion To Supplement The Record Or, Alternatively, To Remand The Case To The Bankruptcy Court For Reconsideration Based On Newly Discovered Evidence Pursuant To Rule 60(B)(2), And In Support Of Cross-Motion For Damages And Costs*

VIA FEDERAL EXPRESS: George E. Rahn, Jr., Esq. Saul Ewing LLP Centre Square West 1500 Market Street, 38th Floor Philadelphia, PA 19102	VIA HAND DELIVERY AND CM/ECF NOTIFICATION: Mark Minuti, Esq. Saul Ewing, LLP 222 Delaware Avenue, Suite 1200 Wilmington, DE 19801
VIA FEDERAL EXPRESS: Warren Zirkle, Esq. McGuire Woods LLP 1750 Tysons Boulevard, Suite 1800 McLean, VA 22102-4215	VIA HAND DELIVERY AND CM/ECF NOTIFICATION: Robert J. Stearn, Jr., Esq. Richards Layton & Finger One Rodney Square Wilmington, DE 19801
VIA FEDERAL EXPRESS: Jonathan Landers, Esq. Gibson Dunn & Crutcher LLP 200 Park Avenue New York NY 10166	

Dated: March 17, 2008

GREENBERG TRAURIG, LLP




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C.A. No. 07-125 (JJF)

**ORDER GRANTING CROSS-MOTION OF ARCELORMITTAL STEEL  
OSTRAVA, A.S. (FORMERLY NOVA HUT, A.S.) FOR DAMAGES AND COSTS  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 8020**

Upon the motion (the "Motion") of ArcelorMittal Steel Ostrava, a.s. (formerly Nova Hut, a.s.) ("Nova Hut"), for the entry of an Order awarding Nova Hut damages and costs, pursuant to Federal Rule of Bankruptcy Procedure 8020 and 28 U.S.C. § 1927, in connection with the

Debtors' Motion for Leave to Supplement the Record or, Alternatively, to Remand the Case to the Bankruptcy Court for Reconsideration Based on Newly Discovered Evidence Pursuant to Rule 60(b)(2); and notice of the Motion having been given; and it appearing that no other or further notice need be given; and after due deliberation and sufficient cause appearing therefor; it is hereby

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is GRANTED.
2. Nova Hut is ordered to file its reasonable costs and damages with the Court within ten (10) days of this Order.
3. This Court shall retain jurisdiction with respect to all matters and disputes arising out of or relating to the implementation of the Motion and/or the implementation of this Order.

Dated: \_\_\_\_\_, 2008

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Joseph J. Farnan, Jr.  
United States District Court Judge